

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOCi, Inc.,

Plaintiff,

v.

Yext, Inc., Stuart Greer, Chris Brownlee,
Jenette Simisky, Megan Menesale, and Keith
Hadelman,

Defendants.

Case No. 1:24-cv-04530-RA-OTW

**NOTICE OF DEFENDANTS' MOTION TO DISMISS SOCI, INC.'S
FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of Defendants Yext, Inc. and Stuart Greer, Christopher Brownlee, Jenette Simisky, Megan Menesale, and Keith Hadelman's Motion to Dismiss SOCI, Inc.'s First Amended Complaint; the declaration of Joseph D. Lockinger, dated August 13, 2024, and the exhibits annexed thereto; and upon all prior pleadings and proceedings had herein, Defendants will move this Court at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York, 10007, before the Honorable Ronnie Abrams, United States District Judge, at a time and date to be designated by the Court, for a judgment, pursuant to Federal Rules of Civil Procedure 12(b)(2), (3), and (6), to dismiss this action for improper venue, lack of personal jurisdiction, and failure to state a claim. Defendants will alternatively move to transfer venue pursuant to 28 U.S.C. § 1404(a).

Dated: August 13, 2024

Respectfully submitted,

COOLEY LLP

/s Gerard O'Shea

Gerard O'Shea
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
goshea@cooley.com

Joseph D. Lockinger
1299 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899

Adam S. Gershenson (*pro hac vice*)
Cooley LLP
500 Boylston Street, 14th Floor
Boston, MA 02116
Telephone: (617) 937-2300
Facsimile: (617) 937-2400
agershenson@cooley.com

*Attorney for Defendants Yext, Inc., Stuart Greer,
Christopher Brownlee, Jenette Simisky, Megan
Menesale, and Keith Hadelman*